
**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
V.	:	18-CR-97
	:	
ROSS ROGGIO	:	
ROGGIO CONSULTING, LLC	:	

MOTION FOR LEAVE TO FILE PRETRIAL MOTIONS

AND NOW, comes Defendants, by and through Counsel, who file this Motion, averring as follows:

1. Defendants were initially charged via Indictment on March 20, 2018, with multiple counts related to weapons exportation.
2. Pretrial Motions were filed and litigated by prior counsel.
3. A Superseding Indictment was filed on February 15, 2022, charging Defendants with torture.
4. Prior counsel did not file pretrial motions within the deadline.
5. Undersigned Counsel were recently retained and entered appearance on August 9, 2022.
6. Upon review of the case, new counsel believes pretrial motions are necessary in regard to the Superseding Indictment.
7. These motions are necessary to the preparation of an effective defense in this matter, and the interests of justice lie in favor of permitting leave to file such motions.
8. AUSA Todd Hinkley concurs in the request to file pretrial motions in regard to the torture charge which was added in the Superseding Indictment.
9. Due to the voluminous nature of the file in this case and the unique subject matter involved, counsel is requesting sixty days to review discovery and file pretrial motions.

WHEREFORE, Defendant respectfully requests this Honorable Court grant the instant motion and provide leave to file pretrial motions within sixty days.

Respectfully Submitted

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